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*Attorney for Defendant,*  
USAA CASUALTY INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JASON SPANEL,

Plaintiff,

vs.

USAA CASUALTY INSURANCE COMPANY;  
DOES I through X, inclusive; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

**CASE NO.: 2:25-cv-00291-CDS-MDC**

**AMENDED PROPOSED JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER  
SUBMITTED IN COMPLIANCE  
WITH LR 26-2(b)**

**1. Meeting:**

Pursuant to FRCP Rule 26(f), a meeting was held on March 10, 2025, and was attended telephonically by Larry E. Mitten, Esq. of CRAIG P. KENNY & ASSOCIATES, for Plaintiff JASON SPANEL (“Plaintiff”) and Jonathan J. Hansen, Esq. of HANSEN & HANSEN, LLC, for Defendant USAA CASUALTY INSURANCE COMPANY (“Defendant”).

**2. Pre-Discovery Disclosures:**

Pursuant to FRCP Rule 26(a)(1)(A), both Plaintiff and Defendant have served their respective pre-discovery disclosures as follows: Plaintiff’s Initial on April 22, 2024, First Supplement on May 15, 2024, Second Supplement on June 11, 2024, Third Supplement on June 13, 2024, Fourth Supplement on June 28, 2024, and Defendant’s Initial on April 2, 2024.

1 **3. Areas of Discovery:**

2 The parties agree that the areas of discovery should include but not be limited to: all claims  
3 and defenses allowed pursuant to the Federal Rules of Civil Procedure.

4 **4. Discovery Plan:** The parties propose the following discovery plan:

5 **A. Discovery Cut-off Date(s):** LR 26-1(b)(1) provides that “unless otherwise ordered,  
6 discovery periods longer than one hundred eighty (180) days from the date the first defendant answers  
7 or appears will require special scheduling review.” The parties agree that there is no need for a special  
8 scheduling review. Defendant filed its Petition for Removal on February 12, 2025. The parties agree  
9 that discovery must commence and be completed no later than August 11, 2025.

10 **B. Amending the Pleadings and Adding Parties:** The parties shall have until May 13,  
11 2025, to file any motions to amend the pleadings to add parties. This is approximately 90 days before  
12 the discovery cut-off date.

13 **C. FRCP 26(a)(2)(D) Disclosure of Experts:** Disclosure of experts shall proceed  
14 according to FRCP Rule 26(a)(2) and LR 26-1(b)(3) as follows: The disclosure of experts and their  
15 reports shall occur on or before June 12, 2025. The disclosure of rebuttal experts and their reports shall  
16 occur on or before July 12, 2025. These deadlines are approximately 60 and 30 days before the  
17 discovery cut-off date, respectively.

18 **D. FRCP 26(a)(2)(D) Dispositive Motions:** Dispositive Motions shall proceed according  
19 to FRCP Rule 26(a)(2) and LR 26-1(b)(4) as follows: The filing of dispositive motions shall occur on  
20 or before September 10, 2025. This deadline is approximately 30 days after the discovery cut-off date.

21 **E. Pretrial Order and FRCP 26(a)(3) Disclosures:** The parties will prepare a  
22 consolidated Pretrial Order on or before October 10, 2025, which is not more than 30 days after the  
23 date set for filing dispositive motions in the case, as required by LR 26-1(b)(5). This deadline will be  
24 suspended if dispositive motions are timely filed pursuant to the deadline prescribed in Section D  
25  
26  
27  
28

1 above. The suspension will stay in place until the Court issues a ruling on said dispositive motions. At  
2 that time, the parties will have 30 days to file the consolidated Pretrial Order or follow a separate order  
3 of the Court. The disclosure required by FRCP Rule 26(a)(3), and objections thereto, shall be made in  
4 the Pretrial Order.

5  
6 **F. Alternative Dispute Resolution:** The parties certify that they met and conferred about  
7 the possibility of using alternative dispute resolution processes, including mediation, arbitration, and,  
8 if applicable, early neutral evaluation.

9  
10 **G. Alternative Forms of Case Disposition:** The parties certify that they considered  
11 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and FRCP 73, and the use of the Short  
12 Trial Program (General Order 2013-01).

13  
14 **H. Electronic Evidence:** The parties certify that they may present evidence in electronic  
15 format to jurors for the purpose of jury deliberations in compliance with the Court's electronic jury  
16 evidence display system.

17  
18 **I. Court Conferences:** If the Court has questions regarding the dates proposed by the  
19 parties, the parties request a conference with the Court before entry of the Scheduling Order. If the  
20 Court does not have questions, the parties do not request a conference with the Court.

21  
22 **J. Extensions or Modifications of the Discovery Plan and Scheduling Order:** LR 26-  
23 3 governs modifications or extensions of this Discovery Plan and Scheduling Order. Any stipulation  
24 or motion to extend a deadline set forth in the discovery plan and scheduling order must be made not  
25 later than 21 days before the subject deadline. A request made within 21 days of the subject deadline  
26 must be supported by a showing of good cause.

27  
28 **K. Format of Discovery:** Pursuant to the electronic discovery amendments to the Federal  
Rules of Civil Procedure effective December 1, 2006, the parties addressed the e-discovery issues  
pertaining to the format of discovery at the Rule 26(f) conference. The parties do not anticipate

discovery of native files or metadata at this time, but each party reserves the right to make a showing for the need of such electronic data as discovery progresses.

DATED this 12<sup>th</sup> day of March 2025.

DATED this 12<sup>th</sup> day of March 2025.

**CRAIG P. KENNY & ASSOCIATES**

**HANSEN & HANSEN, LLC.**

By: /s/ Larry E. Mittin, Esq.

LARRY E. MITTIN, ESQ.

Nevada Bar No. 5428

501 South 8<sup>th</sup> Street

Las Vegas, Nevada 89101

Attorney for Plaintiff

*JASON SPANEL*

By: /s/ Jonathan J. Hansen, Esq.

JONATHAN J. HANSEN, ESQ.

Nevada Bar No. 7002

9030 W. Cheyenne Ave. #210

Las Vegas, NV 89129

Attorney for Defendant

*USAA CASUALTY INSURANCE  
COMPANY*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 3-14-25

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of March 2025, a true and correct copy of the foregoing document was electronically delivered to CM/ECF for filing and service upon all the electronic service recipients.

/s/ Tiffany A. White  
An Employee of Hansen & Hansen, LLC